

Norman Perlberger, Esquire (np4025)  
**POMERANTZ PERLBURGER & LEWIS, L.L.P.**  
Identification No. 15742  
7<sup>th</sup> Floor, Stephen Girard Building  
21 South 12<sup>th</sup> Street  
Philadelphia, PA 19107-3603  
(215) 569-8866  
nperlberger@ppl-law.com

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY - NEWARK**

# SHAHID TANVIR

## CIVIL ACTION

VS

QUEST DIAGNOSTICS

Case #2:05-cv-01464

## ORDER

**AND NOW**, this day of , 2007, upon consideration of the

Motion for Admission of Gerald Jay Pomerantz, Esquire, as counsel pro *hac vice* for Plaintiff Shahid Tanvir, it is hereby **ORDERED** and **DECREED** that said Motion is **GRANTED**. Gerald Jay Pomerantz may act as counsel pro *hac vice* for Plaintiff Shahid Tanvir for all purposes.

BY THE COURT:

Norman Perlberger, Esquire (np4025)  
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[nperlberger@ppl-law.com](mailto:nperlberger@ppl-law.com)

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEW JERSEY - NEWARK**

**SHAHID TANVIR : CIVIL ACTION**

**vs :**

**QUEST DIAGNOSTICS : Case #2:05-cv-01464**

**MOTION TO ADMIT**  
**GERALD JAY POMERANTZ, ESQUIRE AS COUNSEL PRO HAC VICE**

Plaintiff Shahid Tanvir, by and through the undersigned counsel, Norman Perlberger, Esquire, hereby moves this Honorable Court to admit Gerald Jay Pomerantz, Esquire, as counsel pro *hac vice* in the above-captioned matter, and in support thereof avers as follows:

1. Norman Perlberger, Esquire, counsel for Plaintiff, a member in good standing of the Bar of the United States District Court for the District of New Jersey, hereby moves for the admission pro *hac vice* of Gerald Jay Pomerantz, Esquire, for all purposes in the above-referenced litigation.

2. Mr. Pomerantz is a partner at Pomerantz, Perlberger & Lewis, LLP, 21 S. 12<sup>th</sup> Street, Room 700, Philadelphia, PA, where he is actively engaged in the practice of law. He has been actively engaged in the practice of law in Pennsylvania since 1970. See a true and correct copy of the Affidavit of Mr. Pomerantz attached hereto as Exhibit "A".

3. Mr. Perlberger and Mr. Pomerantz were retained by Plaintiff Shahid Tanvir on October 11, 2007, the eve of trial of the case.

4. This is a complicated matter involving claims of both violations of civil rights and employment discrimination laws, for which Mr. Pomerantz has extensive experience and would be of great assistance to undersigned counsel, who will act as lead trial counsel.

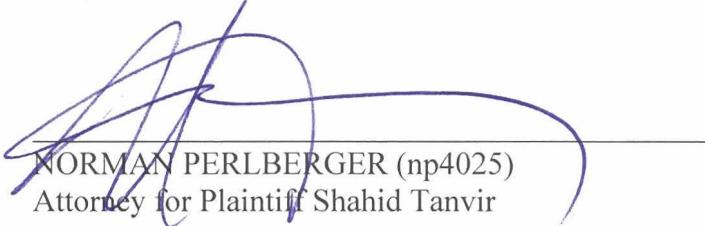
5. There are no restrictions on Mr. Pomerantz's eligibility to practice, nor are there any disciplinary proceedings pending against him ~~as~~ a member of the bars in the jurisdictions in which he is admitted to practice. See Exhibit "A".

6. Should the Court admit Mr. Pomerantz *pro hac vice* ~~as~~ counsel for Plaintiff Shahid Tanvir in the above-captioned matter, Mr. Pomerantz agrees to pay all required fees pursuant to Local Rules of Civil Procedure 101.1(c)(2) and 101.1(c)(3), and New Jersey Rule 1:28-2(a). See Exhibit "A".

7. Norman Perlberger, Esquire, shall remain counsel of record. All papers filed with the Court will be signed by counsel of record who shall be responsible for the same.

WHEREFORE, counsel for Plaintiff Shahid Tanvir respectfully requests that this Motion for Admission of Gerald Jay Pomerantz, Esquire, as Counsel Pro *Hac Vice* be granted.

Respectfully submitted,



NORMAN PERLBURGER (np4025)  
Attorney for Plaintiff Shahid Tanvir

Norman Perlberger, Esquire (np4025)  
**POMERANTZ PERLBERGER & LEWIS, L.L.P.**

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Attorneys for Plaintiff

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**STATEMENT OF PLAINTIFF IN LIEU OF BRIEF  
IN SUPPORT OF MOTION TO ADMIT  
GERALD JAY POMERANTZ, ESQUIRE AS COUNSEL PRO HAC VICE**

Plaintiff Shahid Tanvir, by and through the undersigned counsel, Norman Perlberger, Esquire, hereby states that no brief is necessary in support of Plaintiffs Motion to Admit Gerald Jay Pomerantz, Esquire, as Counsel Pro *Hac Vice*, and in support thereof avers as follows:

1. The instant Motion and supporting Affidavits speak for themselves. All pertinent facts, averments and arguments are contained therein.
2. Any brief filed in support of the instant Motion would be duplicative and repetitive.

3. Thus, no brief is necessary in support of Plaintiffs Motion for Admission of Gerald Jay Pomerantz, Esquire, as Counsel Pro *Hac Vice* in the above-captioned matter.

Respectfully submitted,



NORMAN PERLBURGER (np4025)  
Attorney for Plaintiff Shahid Tanvir

**EXHIBIT “A”**

Norman Perlberger, Esquire (np4025)  
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Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT**

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**AFFIDAVIT OF GERALD JAY POMERANTZ**

I, Gerald Jay Pomerantz, Esquire, being duly sworn, do hereby depose and state the following:

1. I am a member in good standing of the bar of the Commonwealth of Pennsylvania, and the following federal court bars: Eastern District of Pennsylvania, Middle District of Pennsylvania, and United States Court of Appeals for the Third Circuit. There are no restrictions on my eligibility to practice nor are there any disciplinary proceedings pending against me as a member of the bars in the jurisdictions in which I am admitted to practice.

2. I am a partner at Pomerantz, Perlberger & Lewis, LLP, at 21 S. 12<sup>th</sup> Street, Suite 700, Philadelphia, PA, 19107, where I am actively engaged in the practice of law. I have been actively engaged in the practice of law in Pennsylvania since 1970.

I have represented numerous plaintiffs in litigation regarding claims of employment discrimination and civil rights violations.

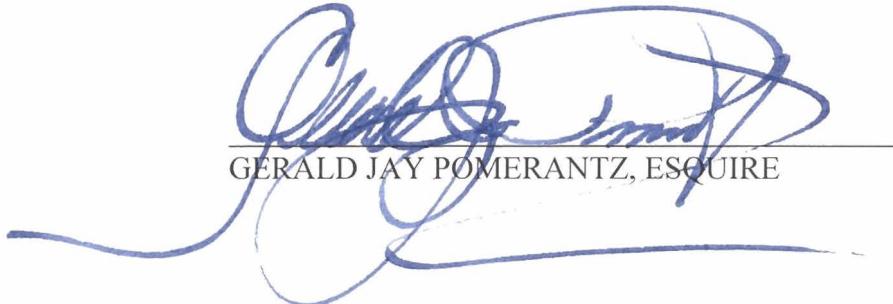
4. The granting of the petition for my admission *pro hac vice* will assist Norman Perlberger, Esquire, my partner at the firm of Pomerantz, Perlberger & Lewis, LLP, and trial counsel in the instant case, as we have just been retained to represent the plaintiff several days prior to the start of trial of the case.

5. I agree to be bound by the rules governing the courts of the state of New Jersey, including the disciplinary rules and the rules of this Court, during the time of my *pro hac vice* admission.

6. Norman Perlberger, Esquire, shall remain counsel of record. All papers filed with the Court will be signed by counsel of record who shall be responsible for same.

7. I agree to pay all required fees pursuant to Local Rules of Civil Procedure 101.1(c)(2) and 101.1(c)(3), and New Jersey Rule 1:28-2(a).

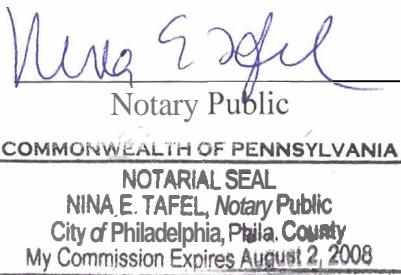
FURTHER AFFIANT SAYETH NOT



GERALD JAY POMERANTZ, ESQUIRE

Sworn to and subscribed

Before me this 12<sup>th</sup> day  
of October, 2007.



Norman Perlberger, Esquire (np4025)  
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Attorneys for Plaintiff

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**vs**

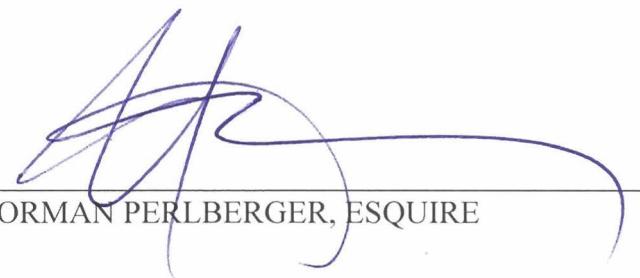
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**QUEST DIAGNOSTICS** : **Case #2:05-cv-01464**

**CERTIFICATION**

NORMAN PERLBERGER, ESQUIRE, hereby certifies that service of a true and correct copy of Plaintiffs Motion to Admit Gerald Jay Pomerantz *Pro Hac Vice* was made this date by ecf filing and by fax to the following:

Karyn D. Jefferson, Esquire  
Karyn D. Jefferson LLC  
1812 Front Street  
Scotch Plains, NJ 07076  
FAX 908-668-4595



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NORMAN PERLBERGER, ESQUIRE

DATED: October 12, 2007